

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Attorney for Christopher Lee McDermott
7

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CHRISTOPHER LEE MCDERMOTT,
14 Defendant.
15

Case No. 2:15-CR-222-RFB

**UNOPPOSED MOTION TO
MODIFY PRETRIAL RELEASE
CONDITIONS TO PERMIT
TRAVEL**

(Expedited Treatment Requested)

16 Comes now the defendant, Christopher Lee McDermott, by and through his counsel
17 of record, Raquel Lazo, Assistant Federal Public Defender, and hereby files this Unopposed
18 Motion to Modify Conditions to Permit Travel. This request is based on the Points and
19 Authorities attached hereto.
20

21 DATED this 15th day of March, 2016.
22

23 RENE L. VALLADARES
Federal Public Defender

24 By: /s/ Raquel Lazo

25 RAQUEL LAZO
Assistant Federal Public Defender
26 Attorney for Christopher Lee McDermott

MEMORANDUM OF POINTS AND AUTHORITIES

1
2 1. This court has previously modified Mr. McDermott's conditions of release to
3 permit him to take his children to certain extracurricular and/or social functions. See Orders (#
4 17, 26). Mr. McDermott has taken his children to these functions in full compliance with the
5 time and travel restrictions set by pretrial services.

6 2. The parties request that Mr. McDermott's conditions be modified to permit him
7 to take his children to Disneyland on March 22, 2016 until March 25, 2016 for spring break.

8 3. The government has no opposition. Pretrial Services Officer Barlow also has
9 no opposition.

10 DATED this 15th day of March, 2016.

11 RENE L. VALLADARES
12 Federal Public Defender

13 By: /s/ Raquel Lazo

14 RAQUEL LAZO
15 Assistant Federal Public Defender
Attorney for Christopher Lee McDermott

16
17 **ORDER:**

18 IT IS SO ORDERED.

19
20 
21 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

22 DATED: March 18, 2016.
23
24
25
26

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER LEE MCDERMOTT,

7 Defendant.

Case No. 2:15-CR-222-RFB

PROPOSED ORDER

9 IT IS HEREBY ORDERED that Defendant Christopher Lee McDermott, is permitted
10 to take his children to school and to any social functions or extracurricular activities as deemed
11 appropriate by pretrial services.
12

13 DATED this _____ day of March, 2016.

14 RENE L. VALLADARES
15 Federal Public Defender

16 By: /s/ Raquel Lazo

17 RAQUEL LAZO
18 Assistant Federal Public Defender
19 Attorney for Christopher Lee McDermott
20
21
22
23
24
25
26

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on March 15, 2016, he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO MODIFY PRETRIAL RELEASE CONDITIONS** (Expedited Treatment Requested) by electronic service (ECF) to the person named below:

DANIEL G. BOGDEN
United States Attorney
SUSAN CUSHMAN
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
Las Vegas, NV 89101

/s/ Brandon Thomas
Employee of the Federal Public Defender